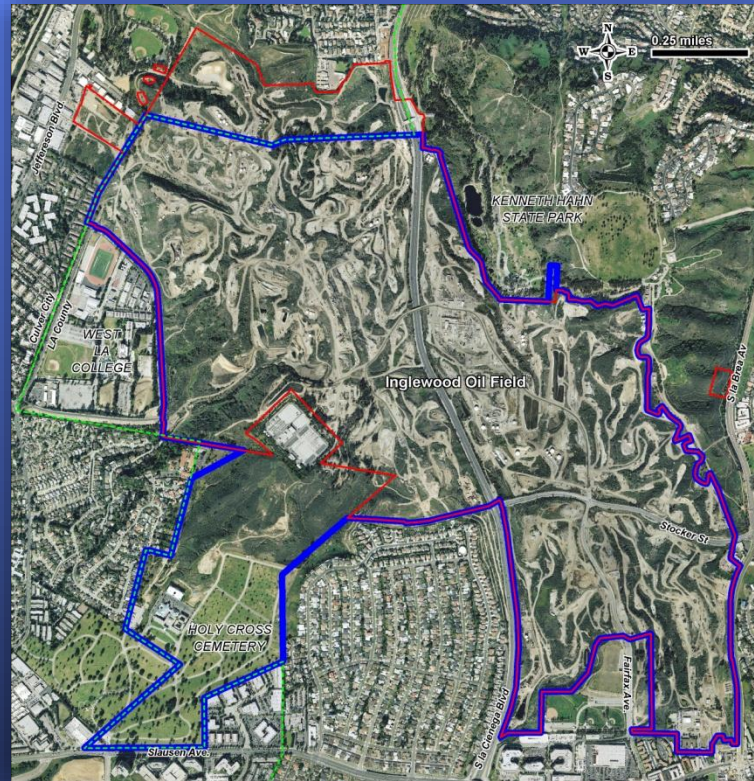


Baldwin Hills Community Standards District (CSD) Draft Periodic Review II



Virtual Hearing
September 30, 2021
6:00 PM

Presentation by:
MRS Environmental
LA County DRP

Periodic Review

CSD
Provision

22.310.070 G

The county shall conduct a comprehensive review of the provisions of this section at least every five years to determine if the provisions of this section are adequately protecting the health, safety, and general welfare. Such reviews shall, among other things, consider whether additional provisions should be added, appended, or removed. One of the main goals of the Periodic Review shall be to evaluate if proven technological advances that would further reduce impacts of oil operations on neighboring land uses should be incorporated into the provisions of this section.

2008 - 2013



2014 - 2018

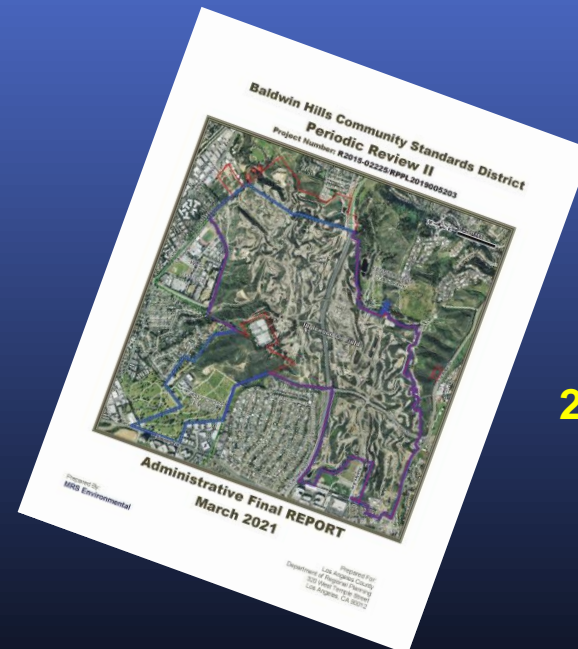
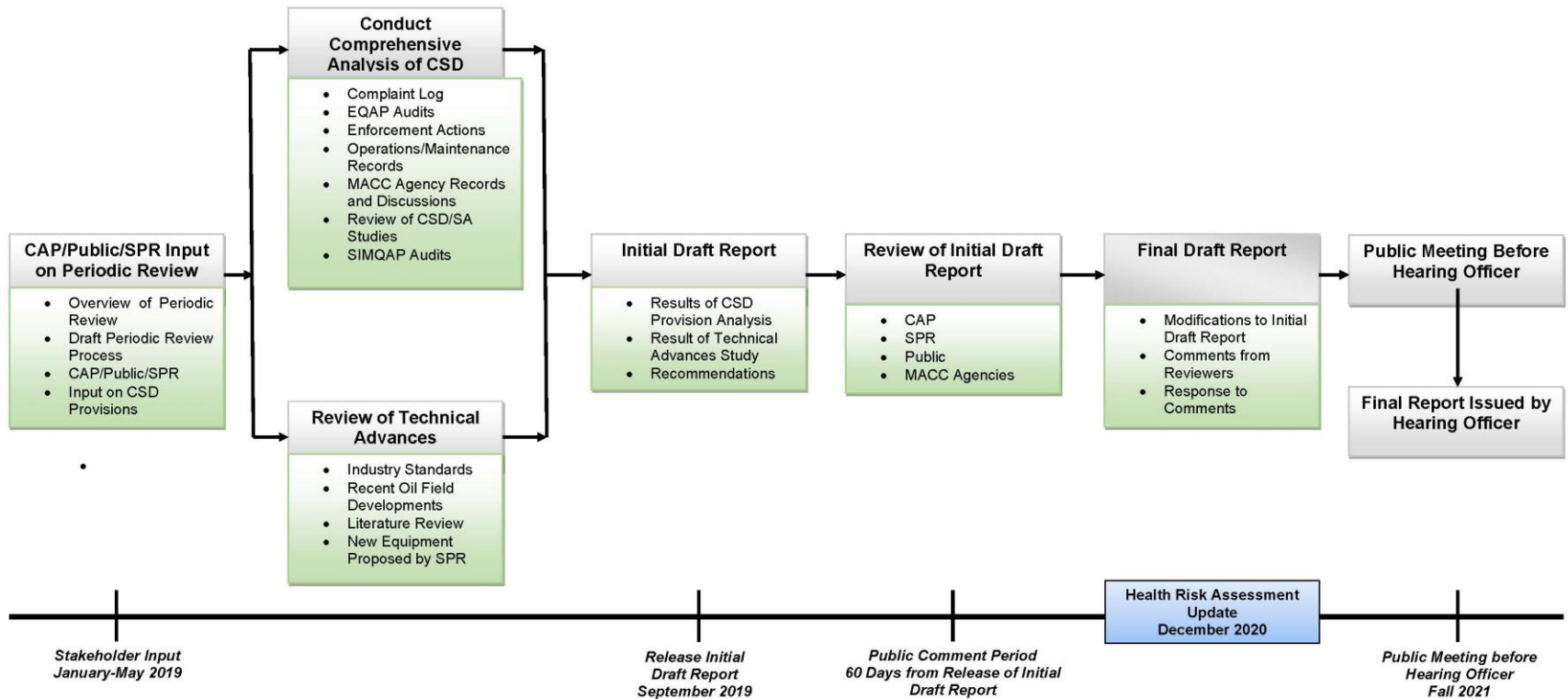


Figure 1.2
Baldwin Hills CSD
Periodic Review Flowchart



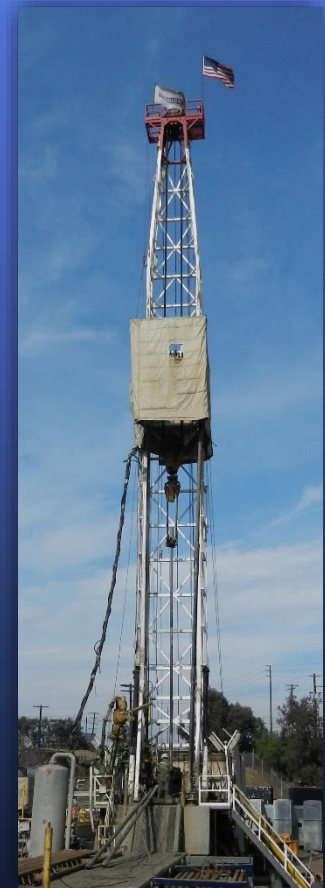
Periodic Review Process



Periodic Review - Methodology

Comprehensive Review of Compliance Records and Plans

- **Compliance plans**
 - Plans submitted as required?
 - Plans current and updated as required?
- **Compliance records**
 - Record documentation complete?
 - Review of any compliance issues
- **Operations and maintenance records**
 - Record documentation complete?
 - Maintenance of equipment current?
 - Any operational or maintenance technological improvements feasible and applicable?

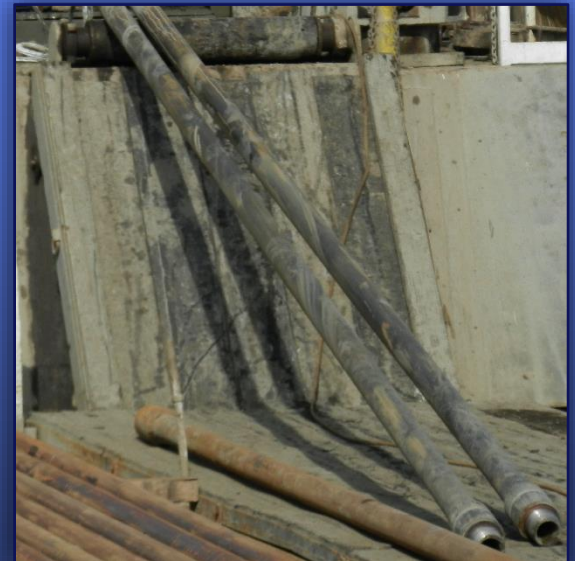


Periodic Review - Methodology

- **Results of the Environmental Quality Assurance Program (EQAP)**
 - Review past audits and results
 - Review of audit recommendations and subsequent implementation
- **Multi Agency Coordination Committee (MACC) records**
 - Review of agency input and recommendations
 - Any plan or compliance issues with other agencies?
- **Violations or enforcement actions**
- **CSD administrative requirements**
 - Confirm administrative record
- **Regulatory permits activity**
 - Review and confirm any required permits are current

Periodic Review - Methodology

- **Complaint log**
 - Review complaints and operator response
- **Input raised by the public**
 - CAP meetings
 - Other correspondence
- **Public input on Periodic Review**
 - Input on draft report
- **Agency Input on Periodic Review**
 - Comments on report scope
 - Comments on Administrative Draft report
- **Input and data from Operator**



Periodic Review - Recommendations

- **Nine recommendations**
- **Why recommendation versus requirement or change to CSD language?**
- **Recommendations enforceable by the existing CSD ordinance**
 - Through a change/improvement in the implementation of the provision
 - A change in the compliance effort of the provision
 - Continued monitoring of an exiting operational practice
- **Approach allows for Improvements to the CSD without need to go through process of “opening” the ordinance to revisions**
- **All 11 of the first Periodic Review recommendations were implemented by the operator**



Periodic Review - Recommendations

CSD Provision	Summary of Recommendation
22.310.050.D	Based on public input, it is recommended the operator consider the use of an alternate geotechnical engineering firm for the property damage complaint follow-up investigations. The use of an alternate firm would bring an additional team of subject matter experts to the issue.

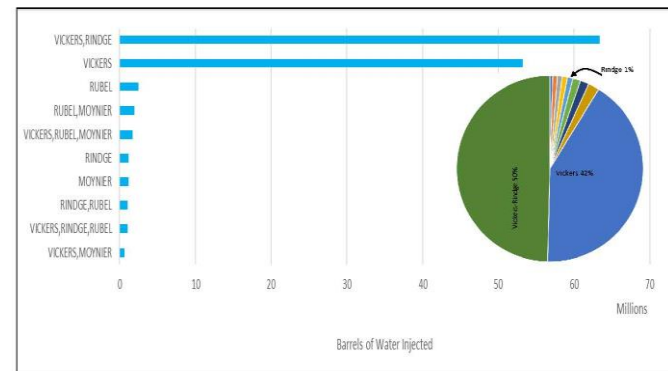
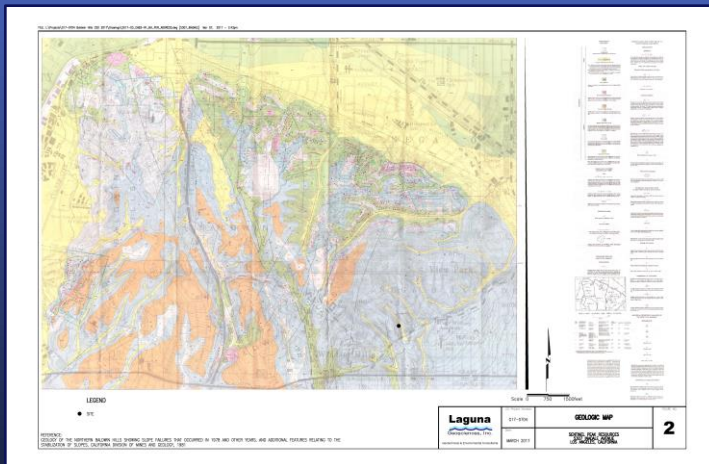


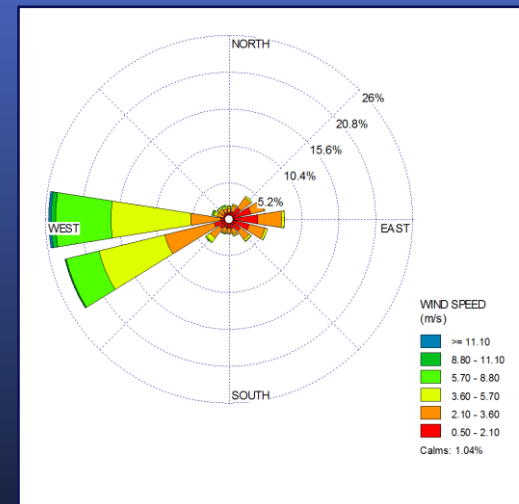
Figure 2.2 IGF reported cumulative water injection by zone, 2017.

Periodic Review - Recommendations

CSD Provision	Summary of Recommendation
22.310.060.G	Based on evidence of some incomplete complaint data, it is recommended that the operator meet with staff involved with the complaint process and the 1-800 telephone line vendor to review the required information necessary for filing a complete complaint. Better complaint documentation will improve the quality of the data collected for a complaint, assist in investigation of the complaint, and therefore upgrade the complaint process and data base.



- Odor
- Noise
- Dust
- Vibration
- Property Damage
- Lighting
- Other



Periodic Review - Recommendations

CSD Provision	Summary of Recommendation
22.310.060.D	Due to the fact that unannounced drills have not taken place in the past, it is recommended that efforts be made to ensure that unannounced drills take place at the oil field as required by the provision of the CSD. The Department of Regional Planning will coordinate with the Fire Department to ensure that unannounced drills occur in the future.

- **Change in the compliance effort of the CSD provision**
 - 22.310.060.D allows for up to two unannounced drills per year

Other Interested Agencies:



- Culver City Fire Department
- DOGGR
- RWQCB
- SCAQMD

Periodic Review - Recommendations

CSD Provision	Summary of Recommendation
22.310.050.O	Recommendation that the Operator continue the use of metal and or plastic bins and tanks consistent with current practice as the elimination of the use of below ground sumps is considered to be a significant environmental benefit.

- Recommendation to continue existing operation practice



Periodic Review - Recommendations

CSD Provision	Summary of Recommendation
22.310.050.Z.3	Based on the results of the 2020 Health Risk Assessment (HRA), all future Annual Drilling, Redrilling, Well Abandonment, and Well Pad Restoration Plan reviews shall include consideration of the HRA results with respect to the number and location of new wells proposed to be drilled in the plan prior to approval by DRP (CSD 22.310.050.Z.3). If more than 25 wells are proposed, the plan review analysis should consider additional potential mitigation which could include further setbacks, emissions reductions or others as determined in the Annual Drilling Plan review.



No new wells drilled since June 2014

No plans to drill in 2021

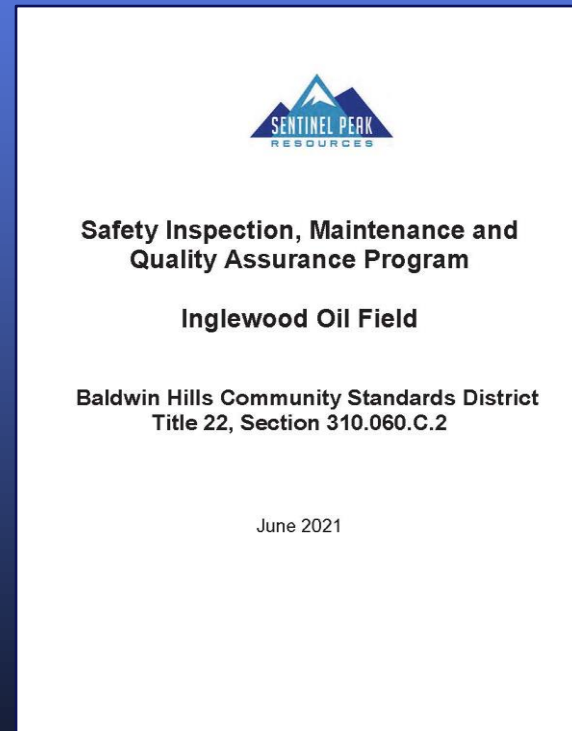
Periodic Review - Recommendations

CSD Provision	Summary of Recommendation
22.310.060.C	To improve the documentation of the oil field wildfire prevention program, it is recommended that the existing electrical maintenance activities be added to the facility Safety, Inspection, Maintenance and Quality Assurance Program (SIMQAP) document.

➤ SIMQAP Updated June 2021

➤ Electrical maintenance section added

➔ Therefore, this recommendation has been implemented



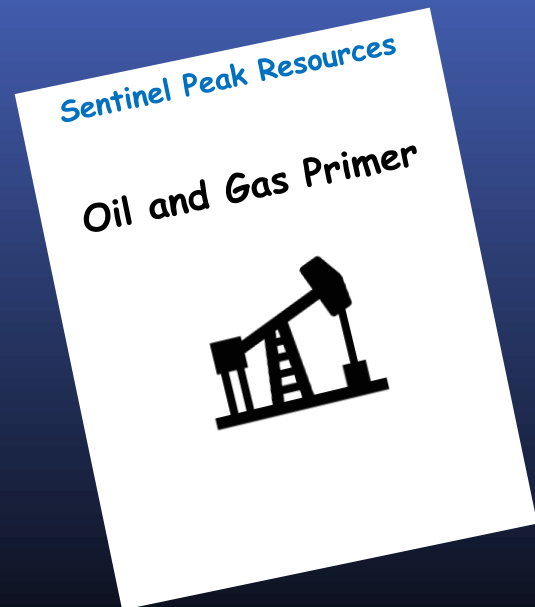
Periodic Review - Recommendations

CSD Provision	Summary of Recommendations
22.310.100.B	<p>Three involving improving the communication of oil field activities to the public:</p> <p>The operator post updates of oil field incidents on the oil field website.</p> <p>The operator provide a Frequently Asked Questions (FAQ) section to the oil field website.</p> <p>The operator provide an oil and gas primer to the oil field website.</p>

Update
FAQS



www.inglewoodoilfield.com



Questions/Comments

SPR GHG Emissions

➤ Below significance threshold

- 2018 – 6,565 MTCO₂e
- 2017 – 7,551 MTCO₂e
- 2016 – 6,575 MTCO₂e
- 2015 – 5,669 MTCO₂e



South Coast
Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4182
(909) 396-2000 • www.aqmd.gov

South Coast AQMD Air Quality Significance Thresholds

Mass Daily Thresholds ^a		
Pollutant	Construction ^b	Operation ^c
NO _x	100 lbs/day	55 lbs/day
VOC	75 lbs/day	55 lbs/day
PM ₁₀	150 lbs/day	150 lbs/day
PM _{2.5}	55 lbs/day	55 lbs/day
SO _x	150 lbs/day	150 lbs/day
CO	550 lbs/day	550 lbs/day
Lead	3 lbs/day	3 lbs/day
Toxic Air Contaminants (TACs), Odor, and GHG Thresholds		
TACs (including carcinogens and non-carcinogens)	Maximum Incremental Cancer Risk ≥ 10 in 1 million Cancer Burden > 0.5 excess cancer cases (in areas ≥ 1 in 1 million) Chronic & Acute Hazard Index ≥ 1.0 (project increment)	
Odor	Project creates an odor nuisance pursuant to South Coast AQMD Rule 402	
GHG	10,000 MT/yr CO ₂ e for industrial facilities	

SCAQMD GHG Threshold

Developed for 90% Reduction (Statewide 2050 Goal of 80% reduction)

Below Threshold is Less than Significant?

- Total of all sources less than the 10,000 tons/year threshold = 10% SCAQMD GHG total
- 90% of SCAQMD GHG Emissions are from Sources >10,000 tons/year
- Target of GHG reduction programs are therefore the “significant sources”
- Mobile sources participate through the State Cap and Trade requirements on end-use fuels (diesel, etc.) including oil field drill rigs and maintenance/rework rigs.

Risk Assessment Results

CA Office of Environmental Health Hazard Assessment and SCAQMD Guidelines

Criteria Description	SCAQMD OEHHA Threshold Values	Baldwin Hills CSD EIR	STI Air Quality Study Oil Field	STI Air Quality Study Total	Mates IV*	SNAPS
Cancer Risk	10	7.5	6.7	340	367	?
Chronic Risk	1.0	0.02	<0.10	---	---	?
Acute Risk	1.0	0.7	<0.10	---	---	?

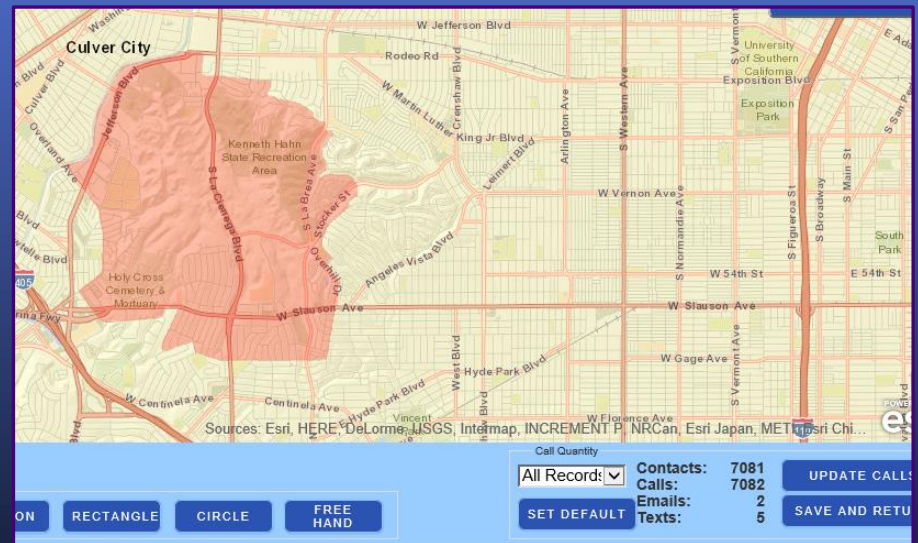
*Note that applying the revised OEHHA methodology to the modeled air toxics levels, the MATES IV estimated population weighted risk is 897 per million, an increase of about 2.5 times higher. It is important to note that this is not a change in exposure levels, and that the relative risks are not changed.

Community Alert Notification (CAN) System

- The oil field CAN system is designed to provide notification to area residents and businesses of an emergency that would require one to take shelter, evacuate or take other protective actions.
- The CAN system is not activated by the operator alone and requires the input from the applicable Fire Department, the agency that makes the ultimate decision on notification to residents.
- With respect to the odor incident on November 22, 2018, the incident was reported and responded to by Cal-OES, DOGGR, and local CUPA/Fire Departments. None of these agencies required activation of the CAN system.

Emergency Response

- Local Fire Departments
- Local Police
- County Office of Emergency Response
- Incident Command System (ICS)
- Contact above agencies to learn more or get involved in your neighborhood emergency management plan.



Information Transparency / Public Outreach

- Section 22.310.100, Public Outreach, was specifically developed to provide information, notification, and outreach to the public on oil field operations.
- Oil Field Ombudsperson – Dan Taimuty
 - DTaimuty@sentinelpeakresources.com
 - Phone: 1-800-766-4108
- County and Oil Field Web Sites contain hundreds of documents.
 - Many of these documents are discussed at the monthly CAP meetings where public input is encouraged, and public comments are addressed by the operator or the County in a timely fashion.
 - Pursuant to CSD 22.3120.050.Z.3, the County must consider comments made by the CAP on the Annual Drilling, Redrilling, Well Abandonment, and Well Pad Restoration Plan prior to approval of the plan.
 - Possibly more information available to the public than any oil and gas project anywhere.



<http://inglewoodoilfield.com>

<http://planning.lacounty.gov/baldwinhills>